

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ZIONS FIRST NATIONAL BANK,)	
)	
Plaintiff,)	
)	
vs.)	Case No: 07 CV 3760
)	
PAUL GREEN, SHERRELL GREEN,)	Judge Coar
ELIZABETH LOADES and HARVEY D.)	
WRIGHT,)	Magistrate Judge Valdez
)	
Defendants.)	

**PLAINTIFF'S MOTION FOR ENTRY OF JUDGMENT AGAINST PAUL GREEN
PURSUANT TO SETTLEMENT AGREEMENT**

Plaintiff Zions First National Bank ("Zions"), by its undersigned counsel, hereby moves this Court to enter judgment against Defendant Paul Green ("Green") pursuant to the terms of the settlement agreement entered into between Zions and Green. In support thereof, Zions states as follows:

1. On April 18, 2008, this Court entered an Order dismissing without prejudice defendants Paul Green and Harvey Wright and incorporating the terms of a settlement agreement between Green and Zions ("Settlement Agreement"). A true and correct copy of this Court's April 18, 2008 order is attached hereto as Exhibit A. The Court attached as Exhibit 1 to the April 18, 2008 order a copy of the Settlement Agreement. The Court retained jurisdiction of this action in order to enforce Paul Green's obligations under the Settlement Agreement.

2. Paragraph 2 of the Settlement Agreement requires Green to make a series of payments to Zions totaling \$300,000. Paragraph 5 of the Settlement Agreement

provides that if Green fails to timely make a required payment under Paragraph 2, all remaining amounts due are deemed to be immediately due and payable. In addition, upon filing a motion with the Court, Zions is entitled to the entry of judgment against Green in the amount of the total remaining amount due under the Settlement Agreement.

3. As of the date of the filing of this motion, Green has failed to make a single required payment under the Settlement Agreement.

4. Because Green has defaulted under the Settlement Agreement, judgment should be entered against Green and in favor of Zions in the amount of \$300,000.

WHEREFORE, Zions respectfully requests that this Court enter judgment against Green and in favor of Zions in the amount of \$300,000.

Dated: August 15, 2008

Respectfully submitted,

ZIONS FIRST NATIONAL BANK

By /s/Mary E. Anderson
One of Its Attorneys

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